

### **REMARKS:**

Sixty four claims were previously filed in this case. All claims have been rejected. Reconsideration of the application in view of the following remarks is respectfully requested. Claim 33 is amended to correct typographical errors in the preamble and add the transitional term “comprising.” This amendment is not believed to alter the scope of the claim.

### **Response to Rejection Under 35 USC § 102(e) in View of Bezos**

Claims 1-10, 12-21, 23-40, 42-56, and 58-64 stand rejected under 35 USC § 102(e) as allegedly being anticipated by U.S. Patent 6,029,141 (“Bezos”). This rejection is traversed.

Claim 1 as filed specifically recites:

- A method for providing enterprise event marketing and management automation comprising the steps of:
- (a) **providing a website including online tools for event marketing and management;**
  - (b) **allowing a user in communication with the website to create a plurality of event pages** describing an event **and a registration page** associated with the event **utilizing the online tools**, each of the plurality of event pages being targeted to one of a plurality of participant groups, each of the plurality of participant groups comprising one or more participants, the event pages including a link to the registration page; .... (Emphasis added)

Thus, claim 1 as filed recites a method providing a user with a website including online tools and allowing the user to generate multiple event pages and a registration page using the online tools. This claimed invention is beneficial in that it provides the user who organizes an event a website providing all the tools needed to create pages about the event (multiple event pages and a registration page). Thus, the user needs only to visit the website to create the pages for event marketing and management. Independent claims 33 and 49 similarly recite similar claimed features and has similar benefits.

Bezos, among other differences, does not disclose “providing a website including online tools for event marketing and management” and “allowing a user in communication with the website to create a plurality of event pages describing an event and a registration page associated with the event utilizing the online tools.” Bezos, in contrast, discloses an Internet-based referral system that enables individuals and other business entities ("associates") to market products, in return for a commission, that are sold from a merchant's website. (See Bezos, Abstract). Thus, Bezos does not disclose the claimed features of providing users with a website including online tools, nor does it disclose allowing the users to create pages using the online tools.

Examiner points to the Associate Enrollment discussion beginning at col. 9, line 40 for teaching of “allowing a user in communication with the website to create a plurality of event pages describing an event and a registration page associated with the event utilizing the online tools.” However, the web pages disclosed in Bezos are from “a local store 136 of HTML documents (Web pages) which can be requested, retrieved and viewed by the applicant,” (See Bezos, Col. 9, ll. 59-61). Therefore, Bezos does not disclose the web pages to be created by the user “in communication with the website ... utilizing the online tools.” Also, Bezos does not disclose the web pages to include “a link to the registration page,” another claimed element of claim 1. Therefore, for at least these reasons, claim 1 is patentably distinguishable over the cited reference. Likewise, claims 33 and 49 are distinguishable over Bezos for the same reasons. Therefore, Applicants respectfully request that Examiner reconsider the rejection to these claims and withdraw it.

As to the dependent claims, because claims 2-10, 12-21, 23-32 are dependent on claim 1, claims 34-40, 42-48 are dependent on claim 33, and claims 50-56, and 58-64 are

dependent on claim 49, all arguments advanced above with respect to claim 1 are hereby incorporated so as to apply to claims 2-10, 12-21, 23-32, 34-40, 42-48, 50-56, and 58-64.

**Response to Rejection Under 35 USC § 103(a) in View of Bezos and Yokell**

Claims 11, 22, 41, and 57 stand rejected under 35 USC § 103(a) as allegedly being unpatentable over Bezos in view of U.S. Patent 6,507,870 (“Yokell”). This rejection is traversed.

As set forth above with reference to claim 1, Bezos does not disclose the claimed features of:

- (a) **providing a website including online tools** for event marketing and management;
- (b) **allowing a user in communication with the website to create a plurality of event pages** describing an event and a registration page associated with the event utilizing the online tools, each of the plurality of event pages being targeted to one of a plurality of participant groups, each of the plurality of participant groups comprising one or more participants, the event pages including a link to the registration page; ... (Emphasis added)

The arguments set forth with respect to independent claims 1, 33, and 49 and Bezos are applicable for dependent claims 11, 22, 41, and 57.

Further, Yokell also fails to disclose the claimed elements cited above. In contrast to the claimed invention, Yokell discloses a method and system to assist a customer to determine whether or not a local copper loop is qualified for DSL service, and obtain DSL service when the loop is qualified. (See Yokell, col. 1, ll. 48-56). The website disclosed in Yokell “allow customers and channel partners to self qualify and on-line order via a web page to determine whether they can receive high speed xDSL services to their home or business.” (See Yokell, col. 4, ll. 15-26). This is different from the claimed features of

“allowing a user in communication with the website to create a plurality of event pages describing an event and a registration page associated with the event utilizing the online tools.” Therefore, Yokell fails to disclose the claimed features cited above.

Likewise, the combination of Bezos and Yokell also fails to disclose or suggest the claimed features cited above. As discussed above, the above claimed features are not disclosed in either reference. However, even if the two references arguably could be combined, at best the combination provides a system and method for enabling associates to market the service of qualifying copper loop for DSL service. This is not what is recited by the current claims.

Thus, alone or in combination, Bezos and Yokell do not disclose the claimed invention as recited in independent claims 1, 33, and 49, as presented herein. Therefore, based on the remarks herein, Applicants respectfully submit that for at least these reasons dependent claims 11, 22, 41, and 57 also are patentably distinguishable over the cited references, both alone and in combination. Therefore, Applicants respectfully request that Examiner reconsider and withdraw the rejection to these claims.

## **Conclusion**

In sum, Applicants respectfully submit that claims 1-64, as presented herein, recite statutory subject matter and are patentably distinguishable over the cited references for the reasons described above. Therefore, Applicants respectfully request allowance of the claims and application.

In addition, Applicants respectfully invite Examiner to contact Applicants' representative at the number provided below if Examiner believes it will help expedite furtherance of this application.

Respectfully Submitted,  
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